

## **CONTINUATION IN SUPPORT OF SEARCH WARRANT**

I, Ryan Roskey, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state as follows:

### **Introduction and Agent Background**

1. This continuation is submitted in support of an application, under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) for a search warrant for information associated with certain accounts stored at an electronic communications service and/or remote computing service provider. The information to be searched is described in the following paragraphs and in Attachment A. The requested warrant would require the provider to disclose to the government copies of the information (including the content of communications) further described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, the government-authorized persons will review that information to locate the items described in Section II of Attachment B.

2. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the

United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

3. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 875(c) – Interstate Communications (i.e., transmitting in interstate or foreign commerce any communication containing any threat to injure the person of another) and 18 U.S.C. § 844(e) – Threat to Kill or Injure by Means of Fire (collectively “Subject Offenses”), have been committed by SEANN PATRICK PIETILA. There is also probable cause to search the information described in Attachment A for evidence or instrumentalities of those crimes further described in Attachment B.

4. I have been employed as a Special Agent of the FBI since 2019 and am currently assigned to the Detroit Division. My duties include the investigation of the Subject Offenses. As a police detective, I was responsible for numerous types of complex criminal investigations involving child abuse, sexual assault, internet crimes against children, child sexual abuse material (CSAM), drug endangered children, human trafficking, narcotics trafficking, firearms violations, gang investigations, fugitives, and violent crime. In this role, I have been assigned to the United States Marshals Violent Fugitive Task Force and the FBI Omaha Safe Streets Task Force. I have completed hundreds of hours of specialized

investigative training from the FBI, Drug Enforcement Agency (DEA) and United States Department of Justice.

5. The statements contained in this continuation are based in part on information provided by U.S. federal law enforcement agents, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, including local law enforcement agencies, information gathered from investigative sources of information, and my experience, training and background as a Special Agent.

6. This continuation is submitted for the limited purpose of providing probable cause in support of the requested search warrant. I have not included each and every fact known to me concerning this investigation.

7. Title 18, United States Code, Section 875(c) prohibits the transmission in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another. I have been advised by the U.S. Attorney's Office for the Western District of Michigan that, to prove a violation of Section 875(c), the government must prove that: (1) the defendant sent a message in interstate commerce; (2) a reasonable observer would view the message as a threat; and (3) the defendant intended the message as a threat or "had some understanding of his statements' threatening character."

*Counterman v. Colorado*, 143 S. Ct. 2106 (2023); *United States v. Doggart*, 906 F.3d 506, 510 (6th Cir. 2018) (citing *Elonis v. United States*, 135 S. Ct. 2001, 2011 (2015)). The Supreme Court in *Counterman* held that the government must prove at least a defendant’s recklessness in true threat cases. *Counterman*, 143 S. Ct. at 2113, 2117-18 & n.5 (rejecting “purposeful” (conscious desire), “knowing” (awareness that a result is practically certain to follow), and “negligent” standards in true threat cases). “True threats” are not protected by the United States Constitution. *Counterman*, 143 S. Ct. at 2111; *Elonis*, 135 S. Ct. at 2016; *see also R.A.V. v. St. Paul*, 505 U.S. 377, 388 (1992) (citing *Watts v. United States*, 394 U.S. 705 (1969)) (“[T]hreats of violence are outside the First Amendment.”). True threats are “statements where a speaker means to communicate a serious expression of an intent to commit an act of unlawful violence to a particular individual or group of individuals.” *Virginia v. Black*, 538 U.S. 343, 359 (2003). The threat need only be communicated in interstate commerce; it need not be communicated directly to the individual or group of individuals that are the subject of the threat. *See Doggart*, 906 F.3d at 512 (observing that *Elonis* “said nothing about an intimidation requirement”); *United States v. Morales*, 272 F.3d 284, 288 (5th Cir. 2001) (finding that statements made to a third party in an internet chat room were, nevertheless, true threats under 18 U.S.C. § 875(c)); *United States v.*

*Myers*, 104 F.3d 76, 77-78 (5th Cir. 1997) (finding that threats made by defendant against the Veterans Administration and Congress during a telephone call to an employee of the Paralyzed Veterans of America were true threats). In other threat contexts, courts have found that the threats need not be communicated directly to the subject of the threat. *See, e.g., United States v. Hanna*, 293 F.3d 1080, 1088 (9th Cir. 2002) (a jury could conclude that statements were true threats against the President though they were never delivered to him, any of his aides or any federal agencies); *United States v. Turner*, 720 F.3d 411, 424 (2d Cir. 2013) (finding that statements encouraging third parties to commit violence against federal judges constitute true threats).

### **Probable Cause**

8. On or about June 13, 2023, the FBI received a report of threatening communications exchanged via online social media messaging. The report identified Instagram username **finnishv64** as making threats to commit a mass casualty incident. Meta Platforms, Inc., which is headquartered in California, owns and operates Instagram. Meta Platforms, Inc./Instagram initially provided a 13-page document of user information and conversations related to usernames **finnishv64**, **finnishv19**, and others. The document contained messages, records about the messages (e.g., dates and times), and subscriber information.

9. The subscriber information for **finnishv64** included date of birth XX/XX/2004<sup>1</sup>, the name Hanz, and **IG UID 58840564741**. The report also stated that the **finnishv64** account was created on March 23, 2023. Meta Platforms, Inc./Instagram also provided the following photograph associated with the account:

**finnishv64 (IG UID 58840564741) -**  
5:52am May 23 2023 UTC+00:00



10. Subscriber information for **finnishv19** included the same date of birth as **finnishv64**, XX/XX/2004, and the same name Hanz. Included in the bio was the following information:

Discord-ImThatGuy#5352 F119US Domestic Terrorist Skinhead

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<sup>1</sup> The full date of birth was provided but is partially redacted here to protect personally identifiable information.

11. Meta Platforms, Inc./Instagram's June 13 disclosure indicated that user **finnishv64** sent the following messages to another Instagram user (identified with username **\_this\_aint\_me\_88**):

a. **finnishv64 (IG UID 58840564741) -**  
2023/05/31 9:58:37pm PDT

Girlfriend left me again for a stupid fucking reason. I honestly just think she found someone else and used the reason as justification to leave.

...

b. **finnishv64 (IG UID 58840564741) -**  
2023/05/31 10:00:35pm PDT

Starting to think plan B is the only option I got left. 🤔 Because fuck this generation for dating to marry.

...

c. **finnishv64 (IG UID 58840564741) -**  
2023/05/31 10:08:37pm PDT

Thanks man, means a lot truly! but It's all good. Honestly was expecting it. She's been ignoring me constantly and just been being a dry texter. But yeah I'm just done at this point. Fuck this world and everything in it. I'm gonna start making plans soon, just gotta buy a few more things.

...

d. **\_this\_aint\_me\_88 (IG UID 32075774145)**  
- 2023/05/31 10:15:08pm PDT

Dam man that's really sucks bro that girl I showed you a few weeks ago is such a pain as well she snaps me like 4 times a day barely talks to me I'm just sick of her and everyone else bro, it's gonna be a shame man when you do it as in I'll miss you man but it's great more your doing it make sure your 100% ready like you've gotta go a see how many people go bc if it's a low number your getting life no matter what like look at Payton 6 kills now has life

- e. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/05/31 10:16:36pm PDT

And 6 kills is pretty low I'm still thinking about doing it  
probably will but I wanna have kids as well so it's hard yk  
...

- f. **finnishv64** (IG UID 58840564741) -  
2023/05/31 10:26:45pm PDT

Ahhh I'm sorry dude.. Hey don't worry man. I'll be here until  
then. I know I'm shit at texting back but you know. 😎😂 and  
again I'm sure we'll meet again in the next life! This world just  
sucks ass. 🤡 I won't be taken alive I'll make sure of that.  
Remember "Heil Hitler!" boom red mist 💣😭 gotta make it  
unique I guess. Maybe. I just need a camera for streaming and  
some more magazines. Don't wanna run out of mags and have  
to reload one 🤡

...

- g. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/05/31 10:31:58pm PDT

HAHAHA that would be so funny just standing there slowly  
reloading a mag real you do need more, yea real hopefully in  
the next life bro based though, this world does such though if  
we didn't have all these shitskins and kikes we'd be fine

- h. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/05/31 10:32:12pm PDT

But where would you stream it?

- i. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/05/31 10:33:06pm PDT

Fucking so annoying how b.t stream go banned before he got to  
the next one

- j. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/05/31 10:33:44pm PDT

My friend and were are probably going to use discord as we  
used a camera to share the mosque and we didn't get banned for  
days



k. **finnishv64 (IG UID 58840564741) -**  
2023/05/31 10:48:25pm PDT

I honestly didn't know b.t attacked more than one. 🧠 Seriously though, Fucking kikes ruin everything they touch. I'd probably do it on discord for people, so they could screen record and send it to others or post it online.

...

l. **\_this\_aint\_me\_88 (IG UID 32075774145)**  
- 2023/06/01 1:01:33am PDT

What will you be writing on your guns bro?

m. **finnishv64 (IG UID 58840564741) -**  
2023/06/01 1:34:48am PDT

Ohh shit I never knew he got to 3 🧠 🧠 fucking mad lad. I don't know yet. I already have some white paint I bought lol. All I know is, it's not just gonna be a copy of Brenton's. Maybe some stuff but I gotta make it unique.

...

n. **finnishv64 (IG UID 58840564741) -**  
2023/06/01 2:07:24am PDT

That's why I gotta make it mostly my own. Don't wanna seem like a copycat attack. I in all honesty don't have other friends lol. You and my ex are my only friends. 🧠 I'm a very anti social Mf. That's why I don't respond all the time. I was planning on just getting some random/trusted people to join my call and record it.

...

o. **\_this\_aint\_me\_88 (IG UID 32075774145)**  
- 2023/06/01 3:11:40pm PDT



...

p. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/06/01 3:12:49pm PDT

Was making that in my hard materials class ended up getting the drill peice stuck in making the 9mm barrel so I just left it hoping nobody knows what I'm doing lol i was using the lave to do it a big drill so I might be in a heap of trouble today 😂🔪

...

q. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/06/01 9:32:43pm PDT

Also btw make sure yk the layout of the place bc btw got stuck on the 2nd or 3rd mosque so he had to shoot threw the windows bc he didn't know where they put the door😂

...

r. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/06/01 10:18:55pm PDT

My knife pretty old too lol, ohh right March 15ths😂 lol I was planning to do mine March 16 the day later and in hope to inspire March to be the month of it yk 😂. Bro come on wtf is with somepeople you cant just get angry at that, that's pretty rude. That's good to hear 🤔

s. **finnishv64** (IG UID 58840564741) -  
2023/06/01 10:43:14pm PDT

That would honestly be so cool bro. We time it a day after each other. We would surely inspire others to take arms against the Jewish controlled state. I only chose the 15th to mimic b.t's attack lol.

...

t. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/06/01 11:12:54pm PDT

Yeah it would aye that's what I was thinking though you'd have to wait another few months but yea I say it would inspire more yea I was going to do the same lol

...

u. **finnishv64** (IG UID 58840564741) -  
2023/06/02 12:45:14am PDT

I have a few spread out across my properties. But in total around 11ish I think? Including converters. Like the 50.cal and 9mm for the Ar. Most are just hunting rifles and shotguns tho. I can fit 5-10 rounds in a mag. Above 5 normally makes the gun jam tho..

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v. **finnishv64** (IG UID 58840564741) -  
2023/06/02 2:04:58am PDT

Probably just the Ar honestly. Im fast with reloading new mags so I really don't need another gun. Gonna be strapped with mags so I won't have ammo problems. 💀 Ahh yeah that's gay as fuck. I figured gun laws there would be fucked. ☐ true that dude maybe I will bring the converter 😂 Ain't nothing fixing those holes 💀

...

w. \_this\_aint\_me\_88 (IG UID 32075774145)  
- 2023/06/02 2:15:21am PDT

Personally I'd bring the natsoc flag in and isis classic one of them then put there head on top

...

x. **finnishv64** (IG UID 58840564741) -  
2023/06/02 2:27:32am PDT

Maybe a shotgun incase they lock the doors. load some buck shot and remove the door. 😞 Yeah that's also a good idea, I

should combine a few mags for even faster reloads! Yeah let's be honest if I use the 50.cal it's taking body parts off. 🤖 Bro I have so many machetes and axes I should so do that! 😬

...

y. **finnishv64 (IG UID 58840564741)** -  
2023/06/02 4:08:05am PDT

Oh for sure I'm taking some homemade Napalm to burn some bodies! I think I heard about that, I just didn't know he went to different mosques. I have to pack some more stuff tomorrow so probably yeah sorry bro. That and I won't wake up until around 3pm 🤖

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z. **\_this\_aint\_me\_88 (IG UID 32075774145)**  
- 2023/06/02 4:12:29am PDT

Do you plan to go for it in 3 days?

12. The above messages are not a complete verbatim account of the exchanges between **finnishv64** and the other Instagram user. I have only cited the above messages for the purpose of establishing probable cause. As demonstrated above, **finnishv64** communicated Neo-Nazi style ideology, antisemitism, suicidal ideologies, glorification of past mass shooters (that advocate similar ideology), and a desire and his intent to mimic past mass shooters/mass casualty incidents.

13. In my training and experience, the reference to "b.t" in the messages above reflects that **finnishv64** specifically references admiration for Brenton Tarrant (Tarrant). Tarrant committed acts of mass murder in New Zealand. On March 15, 2019, Tarrant committed two consecutive mass shootings on Mosques

located in New Zealand. Tarrant killed 51 people and injured 40 more. Tarrant live-streamed his attack via Facebook Live. Tarrant pled guilty to 92 charges including murder, attempted murder, and engaging in a terrorist act. He was subsequently convicted of all charges and sentenced to life in prison. **finnishv64** specifically mentions “I just need a camera for live streaming.” As shown above, **finnishv64** mentions planning the attack to mimic “b.t’s” attack and states “All I know is, it’s not just gonna be a copy of Brenton’s.”

14. According to a Washington Post online article about the attack perpetrated by Tarrant, Tarrant’s bullet proof vest, weapons, and magazines were covered with white symbols and white writings. Some of the writings were in reference to Adolf Hitler and the names of other mass shooters. Investigators believe that the comments about white paint are in reference to Tarrant’s use of white symbols and writings on his gear during the March 15, 2019, attack in New Zealand. The following image was reported to be Tarrant’s bullet proof vest and magazines:



15. On or about June 13, 2023, the FBI made an emergency disclosure request to Meta Platforms, Inc./Instagram seeking records related to Instagram usernames **finnishv64** and finnishv19 from January 1, 2023, to the date of the request. On the same day, Meta Platforms, Inc./Instagram produced records to the FBI, which the FBI reviewed during its investigation. Although the FBI might already have all necessary authority to continue to examine and use the records provided by Meta Platforms, Inc./Instagram, I seek this warrant out of an abundance of caution to be certain that the acquisition and use of those records will comply with the Fourth Amendment and other applicable laws.

16. Additional open-source checks led agents to Pinterest account @finnishv1, which included posts of Nazi imagery and mass killers Brenton

Tarrant and Anders Behring Breivik. According to open-source checks, Breivik killed over 70 people at a youth camp and another seven with a car bomb in the Norwegian capital of Oslo. The below photographs were found on the @finnishv1 Pinterest account:



The Man Concert Concerts



Cute People Men Christchurch >



Tiger li Mg 34 German Soldiers W >



True Marriage Europe News Solite >



17. The below photo was posted to the @finnishv1 Pinterest account which shows an individual wearing a skull mask similar to the photo provided by Instagram for **finnishv64**:





### Identification of Seann Patrick Pietila

18. Open-source research conducted by the FBI identified SEANN PATRICK PIETILA, date of birth XX/XX/2004<sup>2</sup>, as the likely user of account **finnishv64** based on the following evidence:

19. The voluntary disclosure by Meta Platforms, Inc./Instagram on or about June 13, 2023, provided the FBI with additional Meta Platforms, Inc. accounts associated with user **finnishv64**. The following accounts were identified as linked with the **finnishv64** account: seannpietila, seann\_pietila\_, we\_are\_anonymous\_fear\_us, keria\_18, commando\_hans, no\_no\_no\_no\_no\_maybe\_sure, finnishv19, and Seann Pietila. Additionally, the date of birth in the subscriber information provided by Meta Platforms, Inc./Instagram for **finnishv64** matched the date of birth for SEANN PATRICK PIETILA.

20. On or about June 14, 2023, the FBI queried local Lansing, MI school administrators and learned SEANN PATRICK PIETILA attended Lansing Eastern High School during the 2020-2021 school year. The listed address for SEANN PIETILA was XXX North Holmes Street, Lansing, Michigan, 48912. The listed

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<sup>2</sup> The full date of birth is known to me but is not included to protect personally identifiable information.

custodian for SEANN PATRICK PIETILA was Brittany Stob. A check of Michigan Department of Motor Vehicle (DMV) records reveal Brittany Stob was previously Brittany Marie Pietila.

21. The FBI conducted open-source research via Facebook.com and located the Facebook account: <https://www.facebook.com/brittany.pietila>, vanity name “Brittany Marie.”

22. On or about May 20, 2023, the below photo was posted on the brittany.pietila Facebook account:



23. SEANN PATRICK PIETILA previously attended high school in Pickford, MI. On or about June 14, 2023, the FBI showed the above photo to Pickford High School Administration who confirmed the male in the above photo is SEANN PATRICK PIETILA.

24. The voluntary disclosure by Meta Platforms, Inc./Instagram provided the FBI with recent IP addresses used by **finnishv64**. The most recent IP Address provided was IP Address 38.101.7.68 (10 June 2023 06:02 PM UTC). The FBI researched the service provider for IP Address 38.101.7.68 and noted the service provider was CCI Systems, located in Iron Mountain, Michigan. CCI Systems records of subscriber information for the above stated IP Address revealed the subscriber as Kevin Stob, XXXXX South M-129, Pickford, MI 49774. The FBI believes that Kevin Stob is married to Brittany Stob based on Facebook posts showing them together as husband and wife.

25. On June 14, 2023, the FBI conducted open-source research on additional social media accounts linked with Instagram user **finnishv64**. The FBI located a TikTok account with the username **finnishv64**. The FBI noted the

TikTok account listed an additional Discord<sup>3</sup> account under the username ImThatGuy#5352, the same account in the bio for Instagram account finnishv19.

26. The FBI was unable to locate any State of Michigan identification for SEANN PATRICK PIETILA.

27. The FBI searched Michigan State records for firearms registered to SEANN PATRICK PIETILA and his family members. SEANN PATRICK PIETILA had no known firearms registered in his name. The FBI obtained records for firearms registered to SEANN PATRICK PIETILA's mother, Brittany Stob. Brittany Stob had two handguns registered in her name. One handgun was a Sig Sauer, .40 Caliber, Model Number SP2022, and one handgun was a Springfield, 9mm, Model XD.

28. On or about June 14, 2023, the FBI submitted a preservation request to Meta Platforms, Inc./Instagram for account **finnishv64**. On the same day, Meta Platforms, Inc./Instagram confirmed receipt of the preservation request and stated that reasonable steps were taken to preserve the available data for the account(s) requested and that the request will expire 90 days from the preservation date.

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<sup>3</sup> Discord is an American VoIP and instant messaging social platform. Users have the ability to communicate with voice calls, video calls, text messaging, media and files in private chats or as part of communities called "servers."

29. I believe that the records held by Meta Platforms, Inc./Instagram are still available to be obtained by this search warrant.

30. On June 16, 2023, the FBI served a federal search warrant at XXXXX South M-129, Pickford, Michigan, 49774 and on the person of SEANN PATRICK PIETILA. SEANN PATRICK PIETILA was located inside XXXXX South M-129 during the execution of the search warrant. SEANN PATRICK PIETILA was detained during the warrant service and transported to the Chippewa County Correctional Facility, located at 325 Court Street Sault Saint Marie, Michigan.

**Charges Filed Against SEANN PATRICK PIETILA**

31. On June 16, 2023, the FBI charged SEANN PATRICK PIETILA by criminal complaint in the Western District of Michigan, alleging a violation of 18 U.S.C. § 875(c) – Interstate Communications on or about June 1 and 2, 2023.

32. On June 27, 2023, SEANN PATRICK PIETILA was indicted by a grand jury sitting in the Western District of Michigan. The indictment charges him with two counts of making interstate threatening communications, in violation of 18 U.S.C. § 875(c), and specifically identifies several threatening communications he sent on June 1 and 2, 2023. The indictment also charges one count of making a threat to kill or injure by means of fire, in violation of 18 U.S.C. § 844(e), and alleges that on or about June 2, 2023, PIETILA used a telephone to communicate

through an Instagram application to another Instagram user the following threat concerning an attempt to kill and injury other individuals by means of fire:

Oh for sure I'm taking some homemade Napalm to burn some bodies! I think I heard about that, I just didn't know he went to different mosques. I have to pack some more stuff tomorrow so probably yeah sorry bro. That and I won't wake up until around 3pm 📴

### **Background on Instagram**

33. From my review of publicly available information provided by Instagram about its service, including Instagram's "Privacy Policy," I am aware of the following about Instagram and about the information collected and retained by Instagram.

34. Instagram is a service owned by Meta Platforms, Inc., a United States company and a provider of an electronic communications service as defined by 18 U.S.C. §§ 3127(1) and 2510. Meta Platforms, Inc. maintains datacenters to supply its products like Instagram in multiple states outside of Michigan and outside of the United States, including Ireland, Denmark, Sweden, and Singapore. Instagram owns and operates a free-access social-networking website of the same name that can be accessed at <http://www.instagram.com>. Instagram allows its users to create their own profile pages, which can include a short biography, a photo of themselves, and

other information. Users can access Instagram through the Instagram website or by using a special electronic application (app) created by the company that allows users to access the service through a mobile device, which allows subscribers to acquire and use Instagram accounts, like the target account listed in Attachment A, through which users can share messages, multimedia, and other information with other Instagram users and the general public.

35. Instagram permits users to post photos to their profiles on Instagram and otherwise share photos with others on Instagram, as well as certain other social-media services, including Flickr, Facebook, and Twitter. When posting or sharing a photo on Instagram, a user can add to the photo: a caption; various “tags” that can be used to search for the photo (e.g., a user may add the tag #vw so that people interested in Volkswagen vehicles can search for and find the photo); location information; and other information. A user can also apply a variety of “filters” or other visual effects that modify the look of the posted photos. In addition, Instagram allows users to make comments on posted photos, including photos that the user posts or photos posted by other users of Instagram. Users can also “like” photos.

36. Upon creating an Instagram account, an Instagram user must create a unique Instagram username and an account password. This information is collected and maintained by Instagram.

37. Instagram asks users to provide basic identity and contact information upon registration and also allows users to provide additional identity information for their user profile. This information may include the user's full name, e-mail addresses, and phone numbers, as well as potentially other personal information provided directly by the user to Instagram. Once an account is created, users may also adjust various privacy and account settings for the account on Instagram. Instagram collects and maintains this information.

38. Instagram allows users to have "friends," which are other individuals with whom the user can share information without making the information public. Friends on Instagram may come from either contact lists maintained by the user, other third-party social media websites and information, or searches conducted by the user on Instagram profiles. Instagram collects and maintains this information.

39. Instagram also allows users to "follow" another user, which means that they receive updates about posts made by the other user. Users may also "unfollow" users, that is, stop following them or block the, which prevents the blocked user from following that user.

40. Instagram allow users to post and share various types of user content, including photos, videos, captions, comments, and other materials. Instagram



collects and maintains user content that users post to Instagram or share through Instagram.

41. Instagram allow users to post and share various types of user content, including photos, videos, captions, comments, and other materials. Instagram collects and maintains user content that users post to Instagram or share through Instagram.

42. Instagram Direct, Instagram's messaging service, allows users to send private messages to select individuals or groups. These messages may include text, photos, videos, posts, videos, profiles, and other information. Participants to a group conversation can name the group and send invitations to others to join. Instagram users can send individual or group messages with "disappearing" photos or videos that can only be viewed by recipients once or twice, depending on settings. Senders cannot view their disappearing messages after they are sent but do have access to each message's status, which indicates whether it was delivered, opened, or replayed, and if the recipient took a screenshot. Instagram Direct also enables users to video chat with each other directly or in groups.

### **Conclusion**

43. I respectfully submit that there is probable cause to believe that evidence and instrumentalities of violations of the Subject Offenses may be found in the location described in Attachment A. I, therefore, respectfully request that the attached warrant be issued authorizing the search and seizure of the items listing in Attachment B.

44. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Meta Platforms, Inc. Because the warrant will be served on Meta Platforms, Inc., who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.